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ABSTRACT

The Resource Group on Proprietary Schools in Connecticut Postsecondary Education, formed by the Connecticut Commission for Higher Education, studied the 50 private, profit-making schools licensed by the State Board of Education to give vocational instruction. The basis for recommendations made by the group was that proprietary schools be more closely integrated into the postsecondary education system to maximize choices for students and to use state expenditures more efficiently. The group's 14 specific recommendations are characterized by four stated needs: (1) to recognize the legitimacy of proprietary schools in higher education; (2) to maintain flexibility and responsiveness, the greatest strength of the proprietary sector; (3) to protect the autonomy of these schools; and (4) to insure equitable treatment of proprietary school students. Specific suggestions for the proprietary sector involve representation on the Commission for Higher Education, participation in program planning and coordination, a representative organization, contracts for student spaces, student financial assistance, an information system, provisions for degree-granting authority and for information dissemination, and creation of a master plan for the state. Pertinent public laws and organization bylaws are included in the appendices. (Author/MSE)

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PROPRIETARY SCHOOLS IN CONNECTICUT POSTSECONDARY EDUCATION

A REPORT

TO

THE CONNECTICUT COMMISSION FOR HIGHER EDUCATION

BY

A RESOURCE GROUP ON

PROPRIETARY SCHOOLS IN CONNECTICUT POSTSECONDARY EDUCATION

U S DEPARTMENT OF HEALTH,
EDUCATION & WELFARE
NATIONAL INSTITUTE OF
EDUCATION

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APRIL 1975
HARTFORD, CONNECTICUT

This report is the work of an Independent Resource Group, and not of the Commission staff. The recommendations do not necessarily represent the position of the Commission

HE008344

Ætna
LIFE & CASUALTY

151 Farmington Avenue
Hartford, Connecticut 06115

Joseph S. Campisi
Director
Corporate Data Processing Consulting

April 3, 1975

Mr. Donald H. McGannon
Chairman
Connecticut Commission for Higher Education
Post Office Box 1320
Hartford, Connecticut 06101

Dear Mr. McGannon:

On behalf of the Resource Group studying Proprietary Schools in the Connecticut System of Postsecondary Education, I submit to you our final report.

The members of this group gave most generously of their time and effort. Their recommendations, reached through a mutual interchange of ideas and open discussion, express a practical approach and reasonable basis for the intergration of Postsecondary Proprietary Schools into the mainstream of higher education in the State of Connecticut. The approach contained in their report can well serve the student, the taxpayer and the citizenry of Connecticut over the long haul.

I also take this opportunity to express appreciation for the excellent cooperation this Resource Group received from the Commission. I particularly commend the Research Staff Assistants assigned to us for the effort, interest and dedication they exhibited.

The members of this group have assured me that they are prepared to convene again should circumstances warrant their presence or comment.

Very truly yours,

Joseph S. Campisi

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PREFACE

There are few, if any, issues or problems which are entirely unique to the proprietary sector of postsecondary education. This conclusion was recognized at the first meeting of the Resource Group on Proprietary Schools in Connecticut and became a theme resurfacing at all meetings. For many specific questions considered by the group, answers highlighted the fact that the problems facing students in proprietary schools and the institutions themselves are similar to the problems of all students and all postsecondary institutions. How are proprietary school students treated with respect to transfer? Not well, but then transfer policies among traditional institutions of higher education are not as smooth or equitable as might be desired. Is there adequate student financial assistance for students in proprietary schools? No, but then for all students in all institutions there is not enough student financial assistance.

If the proprietary sector is much like the rest of postsecondary education, a full consideration of all of the issues and problems as well as the development of even tentative

solutions is well beyond the scope of this Resource Group on Proprietary Schools working within the time parameters assigned by the Commission. Recognizing the limitations of the specific assignment and time, the Resource Group has made recommendations addressing specific issues, but this approach must be recognized for what it is -- a thumb in the dike. This is a pragmatic approach.

Until much dialogue has occurred and consensus is reached about underlying goals and objectives of the American Education system, all solutions will be pragmatic, sometimes inconsistent, partial answers to immediate problems. The members of the Resource Group believe that the need to reassess the educational system is long overdue and all concerned must call for national attention to this need and support efforts to address it. In the absence of a meaningful and widely agreed upon goal for postsecondary education, the Resource Group has found the following comment by James Trent and Leland Medsker as a good statement offering some important basic principles for educational planners:

> Questions persist about the nature of the vocational and personal development of young adults and about the factors that influence their development and change as they begin to assume their adult roles after high school. Certainly society's prevailing values, its economic system, and schools are important influencing determinants, but value systems and modes of living must inevitably be

modified in order to adapt to a world in flux. Many occupations, for instance, are being eliminated or are changing in kind and requirements, technology is now so dominant in our society that it must be dealt with consistently and creatively by educational and other agencies of society.

The schools are largely responsible for making it possible for young people to earn a living and to achieve "self-actualization" by facilitating their personal and vocational development and helping them toward the identification and realization of their best potential. In this function, the influence of formal education is second only to the family. Therefore, schools and colleges cannot be satisfied with providing only such fundamentals as communication and computational skills, citizenship training, and vocational education. They must also make it possible for youths to acquire principles that will prove sound as they try to shape a satisfying and contributive life...what is needed is that awareness of the complexities of life which results from open, autonomous, objective and flexible thinking, an interest in ideas and social issues and greater general understanding of the nature of society and of the <u>world of work.</u>[1] (emphasis added)

I. INTRODUCTION

ESTABLISHMENT OF THE RESOURCE GROUP

During the development of Connecticut's first Master Plan for Higher Education, the Commission for Higher Education recognized that in addition to the eight topics receiving special attention in the plan, a number of other topics merited special attention in the master planning process. Because of time constraints, it was determined that these additional topics should be scheduled for inclusion in the first biennial update. Proprietary schools was one of the topics so identified.

The catalyst for focusing on proprietary schools is found in directives of state and federal legislation. Prior to 1970, the Commission for Higher Education had neither legal obligation nor responsibility for the state's proprietary schools; the schools' only legal relationship with the state was through the State Board of Education which grants through licensing these schools authority to operate. Amendments to state and federal legislation require that the Commission for Higher Education assume new relationships with the proprietary sector.

- In 1973 the Connecticut General Assembly acted to amend state statutes to allow qualified profit-making institutions to seek licensure and accreditation to award associate degrees.

- The Commission for Higher Education was designated Connecticut's "1202" planning commission. The 1972 Amendments to the 1965 Higher Education Act require "1202" commissions to enable states to participate in a number of federal grant programs.

How the Commission has responded and what further activity should be undertaken in response to these legislative directives were concerns for the Resource Group.

METHOD FOR THE STUDY

There are many profit-making schools in Connecticut. One major distinction among them is that some are vocational, preparing students for employment, and others are avocational, giving people skills for use in leisure time. For purposes of this study, the Resource Group focused on those private, profit-seeking postsecondary schools licensed by the State Board of Education to give vocational and occupational instruction.

Early in its deliberations the Resource Group agreed upon an objective to serve as the basis on which to conduct the study and as a foundation for recommendations in the report. This objective was:

That proprietary schools in Connecticut be more closely integrated into the postsecondary education system because to do so maximizes freedom of choice for students and is a more efficient use of state expenditure for education.

Having adopted the objective, the members of the group identified numerous areas in which the proprietary sector and and its students are not fully recognized as equal partners in the postsecondary education enterprise. Transfer problems, student financial assistance, contractual opportunities, and developing appreciation for vocational education were among the many issues which surfaced at early meetings. Because time limitations obviated the possibility of looking at all issues in depth, the Resource Group concluded that an efficient method for arriving at recommendations would be through the use of subcommittees.

The group divided into five subcommittees. The subcommittees and members of each were:

Finance and Administration

Michael Taub (chairperson)
Robert Butler
John Lowry

Licensure and Accreditation/Student Financial Assistance

David Shefrin (chairperson)
Marian Belgrave
Frank Juszli

Program Planning

Alexis Sommers (chairperson)
Robert Butler
John Harrington
Daniel McLaughlin
Adele Paier
Elaine Stewart

Research and Publications

Evan Synder (chairperson)
Roger Clayman

State Board for Academic Awards

Douglas Fellows (chairperson)
William Kinnard

Each subcommittee after completing its assignment, reported recommendations to the full Resource Group. Subcommittee recommendations were adopted by the Resource Group subsequent to considerable discussion and modification. These recommendations, as well as background and supporting information, are presented in Section III.

II. PROPRIETARY SCHOOLS: A NATIONAL AND STATE OVERVIEW

MAJOR CHARACTERISTICS OF THE PROPRIETARY SECTOR

Although proprietary schools have existed as long as any other education enterprise in the United States, until quite recently few studies have focused on these schools and their students. The U. S. Office of Education only recently initiated efforts to determine the exact number of schools in the country. Commenting on the lack of information, Lyman Glenny, Director, Center for Research and Development in Higher Education, University of California at Berkeley, has observed that educational researchers, administrators and even government leaders trained in traditional colleges and universities have ignored proprietary schools, but that "discernment sharpened considerably when we found that college enrollments were leveling off, while those in proprietary institutions continued to increase."[2] As noted previously, the 1972 Higher Education Amendments were the first encompassing recognition of the proprietary sector by the federal government. It is likely that general provisions of the amendments, and particularly the specific directive

to include representation of the proprietary sector on state commissions, will result in a much needed upsurge in study and writing about the proprietary sector

NUMBER OF SCHOOLS AND ENROLLMENTS

The National Center for Education Statistics recently published a directory of noncollegiate institutions, including proprietary schools, which are approved by state education departments, accredited by national accrediting agencies recognized by the U. S. Office of Education, or eligible for the Federal Insured Loan Program or Veterans Administration benefits. Over 8,000 proprietary schools are listed. In 1973 the Carnegie Commission estimated that, excluding those enrolled in correspondence study, 3.8 million students are enrolled in proprietary schools. Calculating total post-secondary enrollment at 73.8 million, the Carnegie Commission estimates place 5.1 percent of national postsecondary enrollments in proprietary schools. A number of recent studies suggest that enrollments in the proprietary sector will continue to increase while those in collegiate institutions will stabilize or decline.

PROGRAMS AND INSTRUCTION IN PROPRIETARY SCHOOLS

The most widely understood characteristics of proprietary

schools is that they are profit-making. This single fact has resulted in much empirically unsupported conjecture -- often negative -- about the nature of education in these schools. Fortunately, a number of recent studies are available and gradually mythology is being replaced with factual information. Even the profit motive and education are being looked at in a different light. Many who have studied proprietary schools point out that the profit motive might well be viewed as a self-enforced quality control mechansim; the very survival of proprietary schools is based on their ability to offer programs for which students are willing to pay unsubsidized tuition costs.

A number of distinctive features characterize education in proprietary schools. These schools offer training in occupational and vocational areas and emphasize skills necessary for employment. Most proprietary schools have a single, well-defined educational mission. Needs in the marketplace are an important factor in determining program offerings and for this reason proprietary schools are often in the forefront in identifying and initiating new educational programs to meet the needs of business and industry. Historically, this has been the case: "In 1881 one estimate indicated that 71,000 students enrolled in proprietary business schools as compared to 5,800 enrolled in business programs in colleges

and universities."[3] Usually an individual school offers a limited number of programs in one career area. The limiting of program offerings can result in high quality instruction because the total resources of the institution are concentrated toward meeting one end. Unlike traditional colleges, proprietary schools see job placement as an important central function.

While much of the instruction in proprietary schools may be similar to that in nonprofit institutions, proprietary schools often adopt innovative teaching methods more quickly than traditional colleges. Short-term and modular courses, individualized instruction, flexible scheduling and the use of technology are common features in proprietary schools. The use of these educational methods are beneficial to both the institutions and students, yielding efficient use of instructors and allowing new students to enter frequently. H. H. Katz, who has looked at the teaching in Illinois proprietary schools, thinks the teachers' attitudes are noteworthy: "...most private schools consider a sizeable number of students failures in one instructor's course, or in several courses over time, as an indication of the instructor's failure...Instructors in private vocational schools are urged to look at their students as 'clients' not 'charges'... The schools are convinced that creditable teaching performances

can be assured by making teaching capability the main criterion for reward and advancement; and instructors are not usually given tenure." [4]

PROPRIETARY SCHOOL STUDENTS

Practical educational programs and teaching methods make proprietary schools particularly attractive for many students. Wilford Wilms recently reported that community college and proprietary school students come from similar socioeconomic backgrounds and have similar job aspirations, but he and others note some differences. Proprietary schools emphasize self-pacing and individualized instruction, key elements in remedial work. These factors as well as the practical orientation of the training, contribute to student motivation and success. Thus, these schools are an alternative for students who have rejected more traditional educational settings and may explain why proprietary schools enroll significant numbers of minority students. Many of the programs offered in proprietary schools are in career fields traditionally chosen by women, and more women than men are enrolled. The average age of proprietary school students is slightly higher than collegiate students; 15.1 percent of the students in proprietary schools are over 29 as compared to 6.5 percent of those in collegiate institutions.

PROPRIETARY SCHOOLS IN CONNECTICUT

At the present time, the State Board of Education licenses fifty proprietary schools to operate in Connecticut. A listing of these schools appears in Appendix A. To obtain current and comparable information about the schools, a questionnaire which included inquiries about enrollments, programs and finance was sent to each of the schools. Thirty schools returned the questionnaire in time to be included in the analysis for this report.

Three of the responding schools offer only correspondence courses and many of their students are not Connecticut residents. Correspondence schools not based in Connecticut also make their courses available to Connecticut residents, but are not included here. The correspondence schools operating from Connecticut offer courses in yacht design, commercial art, illustration and design, painting, and photography. Current enrollment in the three correspondence schools is 6,894. The information which follows does not include information about the correspondence schools.

ENROLLMENT

Annual enrollment in individual schools during fiscal year 1973-74 ranged from 12 to 572. The total enrollment

for the responding schools during the 1973-74 fiscal year was 5,245. Forty-five percent of those enrolled were men and 55% were women. These figures reflect national averages and the fact that majority of the schools offer programs in secretarial studies. Minorities represent approximately 11% of the enrollment.

The percentage of schools for the range of enrollments during fiscal year 1973-74 was:

Number of Students	Percentage of Schools
200 and over	50%
199 - 150	17%
149 - 50	25%
49 or less	8%

PROGRAMS

A total of 61 programs in 25 major fields are offered by the 27 schools. The largest number of schools, 13, offer courses in business and secretarial subjects. Five schools specialize in mechanical and engineering technologies and three in data processing. Other specialized programs include banking, broadcasting, dental technology, modeling and tractor trailer driving. Table 1 details the type and number of programs offered in all the schools reporting. The

length of programs ranges from 2 to 72 weeks with average length programs approximating 40 weeks. Most, but not all, programs require a high school diploma for admission.

STUDENT FINANCE

Tuition charges in Connecticut proprietary schools vary widely and are not readily compared to the credit hour or per semester charges of collegiate institutions. Generally, charges for technological and computer programs are higher than for those in business and secretarial programs; the cost of secretarial programs averages $32.00 per week and technological programs average $59.00 per week. Total costs vary both because of level of tuition charges and length of programs.

The only source of state affiliated student financial assistance available to students in proprietary schools is through the Connecticut Guaranteed Student Loan Program. At a total of nine schools, 281 students borrow an average of $1,500.00 each.

Table 2 details the federal programs used by Connecticut students, the number of schools which these students attend and the average amount of the grant or loan.

TABLE 1: PROGRAMS OFFERED IN CONNECTICUT PROPRIETARY SCHOOLS

Programs	Total Number Available
BUSINESS AND COMMERCE TECHNOLOGIES	
1. General Business [including bookeeping]	2
2. Accounting	8
3. Banking and Finance	1
4. Marketing, distribution, purchasing	
5. Business and industrial management	1
6. Secretarial [including legal, medical, and executive secretary, office machine operation, stenography]	20
7. Communications and broadcasting	2
8. Transporation and public utility	1
9. Travel Agent	1
10. Real Estate	2
11. Retailing and fashion merchandizing	3
12. Modeling	1
DATA PROCESSING TECHNOLOGIES	
13. General data processing	2
14. Keypunch operator and other	
15. Input preparation	
16. Computer Programmer	5
17. Computer operator and peripheral equipment operation	2
HEALTH SERVICES AND PARAMEDICAL TECHNOLOGIES	
18. Dental Assistant	1
19. Dental Laboratory	1
20. Medical Assistant and Medical Office Assistant	1
MECHANICAL AND ENGINEERING TECHNOLOGIES	
21. General mechanical and engineering	1
22. Welding	2
23. Electronics and machine [television, appliance, office machine repair, etc.]	2

TABLE 1 (cont'd)

Programs	Total Number Available
MECHANICAL AND ENGINEERING TECHNOLOGIES (cont'd)	
24. Construction and building [carpentry, electrical work, plumbing, sheet metal, air conditioning, heating, etc.]	2
PUBLIC SERVICE RELATED	
25. Public Administration and Management	1

TABLE 2 FEDERAL STUDENT FINANCIAL ASSISTANCE PROGRAMS

Program	Number of Schools	Number of Students	Average Award
Guaranteed Student Loan	2	112	$1,440.00
National Direct Student Loan	3	133	735.00
Manpower Development Training Act	8	16	770.00
Veterans Administration	15	206	Varies Widely
Supplemental Educational Opportunity Grant	4	105	735.00
Basic Education Opportunity Grant	6	47	1,290.00

INSTITUTIONAL FINANCE

The single largest source of institutional income for Connecticut proprietary schools is student charges. Nearly all schools receive over 90% of their income from this source. Government aid accounted for an average of 2.4% of the income received. Auxiliary enterprises such as bookstore and food-service operations yielded an average of 1.7% of institutional income. Other sources including gifts and endowment accounted for an average of 5.9% of income.

The largest expenditure was for instructional costs; the average for all schools was 45%. On the average, about equal percentages of the budget were spent for plant operation, 24.5%, and administrative costs, 22.5%. Institutions allocated about .5% of their budgets for institutional student financial assistance. Support of auxiliary enterprise took an average of 1% of the budget and 6.5% was allocated to other expenses.

CONNECTICUT PROPRIETARY SCHOOLS AND STATE GOVERNMENT

In Connecticut state statutes, Section 10-8, (see Appendix B) require that any school offering training for certain occupations to more than five students must be licensed to operate by the State Board of Education. Regulations for the licensing procedure set minimum standards for school personnel, teaching, programs, and many administrative

procedures. Among the factors considered by the State Board before approving a license is an analysis of labor market needs in the occupational area in which the school proposes to offer instruction. To make this determination, the State Department of Education consults with the State Labor Department.

A second function of the State Department of Education is to evaluate and approve specific proprietary school programs to determine eligibility for Veterans Administration assistance to students. Other agencies of state government such as the rehabilitation program and CETA programs may contract with licensed proprietary schools for training of participants in the program.

As has been noted previously, as a coordinating board, the Commission for Higher Education, has no legally defined relationship to the state's proprietary sectors in planning and coordinating activities, participation is at the descretion of individual schools.

III. FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

The recommendations which follow below address specific issues and are based on specific findings and conclusions. In addition, however, Resource Group deliberations resulted in a number of general conclusions about the proprietary sector of postsecondary education. These general conclusions form the foundation for the specific recommendations and may be viewed as principles for determining the Commission's relationship with the proprietary sector. These general conclusions may be expressed as four needs:

- The need to recognize the legitimacy of the proprietary sector
- The need to maintain flexibility in proprietary schools
- The need to protect the autonomy of the proprietary schools
- The need to insure equitable treatment for proprietary school students

LEGITIMACY

The Resource Group believes that for too long proprietary schools and their students have been an under-recognized

component of postsecondary education. The legitimacy of these schools must be acknowledged. While in the nation as a whole a few schools engage in questionable business practices and offer less than adequate training, the majority are sound in administration and education.

FLEXIBILITY

Flexibility is perhaps the greatest strength of the proprietary sector. The administrative and educational practices of proprietary schools are responsive to the needs of students as well as the potential employers of students. Flexibility and responsiveness are valuable assets which should be safeguarded. While some schools may determine it worthwhile to exchange a modicum of flexibility to meet the requirements of degree-granting status, the basic characteristics of the schools should be maintained.

AUTONOMY

Proprietary schools are independent, taxpaying, corporate entities and their autonomy must be protected. The autonomy of independent and public colleges is long established and commonly accepted by agencies of government. Once minimum quality controls for the protection of students and business ethics have been enforced by appropriate government agencies,

in Connecticut by the State Board of Education, proprietary schools should not be subjected to more governmental oversight than any other independent educational enterprise. At the same time, these schools should be given the opportunity to participate in various voluntary associations with governmental agencies with the understanding that reasonable governmental controls may be imposed.

EQUITY

Both proprietary schools and their students should be treated equitably. The 1972 Amendments to the Higher Education Act have opened the door for wider acceptance of the proprietary sector, at the federal level and states should now begin to model similar relationships. The most pressing need is for students to have an equal chance to compete for financial assistance to continue their education in the type of institution most suitable to their needs.

REPRESENTATION ON THE COMMISSION FOR HIGHER EDUCATION

RECOMMENDATION 1: *That the Commission for Higher Education recommend that the General Assembly amend Section 10-323 of the General Statutes to include provision requiring that one member of the Commission for Higher Education be affiliated with a proprietary postsecondary institution in the state.*

In all planning and provision of vocational occupational education programs, the best outcomes will result if all responsible for educational programs are involved. This was undoubtedly a part of the thinking of federal legislators who included the directive that representatives of the proprietary schools in each state sit on the states' postsecondary planning commissions. Section 1202 reads: "Any state which desires to receive assistance under Section 1203 [planning grants] or Title X [grants for community colleges and occupational education programs] shall establish a state commission...which is broadly and equitably representative of the general public and public and private nonprofit and proprietary institutions of postsecondary education in the State."

Currently, Connecticut is the only state with a postsecondary planning commission which does not include a person from the state's proprietary schools. Members of the Resource Group believe that this is a serious omission and that a person from the proprietary sector should be appointed as soon as possible. When the Commission for Higher Education was established by the General Assembly in 1965, legislators wisely provided that representation of the independent colleges be included on the Commission. A similar provision should be made for the state's proprietary schools. While

it is possible that the governor might name such a person when making appointments to the Commission, the Resource Group believes that the best approach would be to make such representation de jure and not de facto.

PARTICIPATION IN PROGRAM PLANNING AND COORDINATION

RECOMMENDATION 2: *That the Commission for Higher Education's Subcommittee on Coordination of Planning be reconstituted to provide equitable representation for all sectors providing postsecondary education. An SCP majority should not automatically rest with the public or private (non-profit and profit) sectors; balance between these sectors is recommended.*

RECOMMENDATION 3: *That the Connecticut Association of Proprietary Schools (CAPS) recommend persons from proprietary schools in Connecticut to serve on the Subcommittee on the Coordination of Planning and that the Commission for Higher Education consider the CAPS recommendation.*

Providing representation of the proprietary sector on the Commission for Higher Education will insure that the interests of the proprietary sector are acknowledged at the ultimate level of decision making. Equally important, however, is provision for proprietary school involvement in all of the Commission's ongoing planning and coordinating activities. Many members of the Resource Group feel strongly that one of the most critical coordinating functions of the

Commission is carried on in the Subcommittee on Coordination of Planning (SCP).

The functioning of the SCP was examined closely during the development of the Master Plan by the Resource Group on Programs. The first finding of the Resource Group indicated:

> "Inclusion of proprietary schools and hospital schools with the institutions of higher education in a statewide system for the coordination of postsecondary educational programs under the aegis of the Commission for Higher Education is in the best interests of the citizens of Connecticut." [5]

The Master Plan itself contains a recommendation calling for inclusion of the proprietary sector in the SCP. Recommendation 38 reads:

> That membership on the Subcommittee on Coordination of Planning include one representative from each of the constituent units in the public system, one from the Commission for Higher Education, one from the independent college and one from the proprietary schools. [6]

The Commission has not fully implemented this recommendation nor accompanying recommendations concerning the SCP, but it has invited a State Department of Education consultant to serve on SCP. It is the opinion of the Resource Group that this is not appropriate representation for proprietary schools. The Resource Group understands the difficulty in identifying a single person to represent all proprietary schools in the state. Not all schools belong to a single organization

authorized to represent their interests (see recommendation 4). However, a significant number do belong to the Connecticut Association of Proprietary Schools (CAPS) and this organization is in the best position to assist the Commission for Higher Education in identifying a qualified representative.

The composition and function of the SCP are, the Resource Group judges, critical to the overall planning and coordinating responsibilities of the Commission for Higher Education. The Subcommittee on Programs reported and recommended the following to the full Resource Group:

> Major program competition exists between state community colleges and proprietary schools. Program coordination would seem to be essential, especially as proprietary schools begin to offer A.O. degrees. It is, therefore, recommended that the SCP be reconstituted to provide for adequate representation and to protect overall constituent groups. An SCP majority should not automatically rest with the public or private sector. Equivalent balance between these sectors is recommended. A recommended SCP composition is as follows: one representative from each state unit, namely the technical colleges, the state colleges, the community colleges, the Board for State Academic Awards, and the University; three representatives from the independent colleges (CCIC): one representative from hospital schools; and one representative from the proprietary schools (CAPS). A member of the CHE would serve as chairman and cast tie-breaking votes.

Resource group members from public and independent colleges, as well as from proprietary schools, voiced considerable concern that major strengths of the proprietary sector,

independence and flexibility, could be hampered by participation in SCP, even when such participation is of a voluntary nature. One member commented: "Until such time as the SCP can demonstrate that it will treat all institutions in the state now falling within its jurisdiction in an equitable manner, I can see no reason to jeopardize what the proprietary schools can do now by placing them under this organization, even with one voting member on SCP...Their flexibility must be retained." In addressing this vital Commission activity, the Resource Group urges that the Commission for Higher Education continue to seek resolution of the controversial issues about SCP and, in doing so, recognize the interests of the proprietary sector.

A REPRESENTATIVE ORGANIZATION FOR ALL PROPRIETARY SCHOOLS

RECOMMENDATION 4: *That all proprietary schools in Connecticut join together in, and adequately support, an organization to represent their mutual interests.*

The desirability of the proprietary sector developing a relationship to the Commission for Higher Education which parallels the relationship between the Commission and the state's independent colleges is clear. The existence of the Connecticut Conference of Independent Colleges (CCIC) facilitates defining the relationship because it is a single organization representing all (except some theological

seminaries) independent institutions in the state. An important characteristic of the CCIC should be emphasized: it is a voluntary association. While it is true that all independent collegiate institutions are members, the member institutions vary in the anticipated and actual benefits derived from membership. The Resource Group believes the existence of a similar association of the state's proprietary schools should be encouraged.

The Resource Group recognizes the diversity of the proprietary sector. It may be anticipated that as some proprietary schools achieve degree granting status a major division among schools will arise. In recommendation 4 it is not intended to support an action which would substantially infringe upon the autonomy of any school, but rather to encourage common effort to represent mutual interests. The framework of an organization of the type desirable exists in the Connecticut Association of Proprietary Schools. A description of this organization and its by-laws are contained in Appendix C. For purposes of comparison, similar information about the Connecticut Conference of Independent Colleges follows in Appendix D.

CONTRACTS FOR PROGRAMS, FACILITIES AND SERVICES

RECOMMENDATION 5: *That the Commission for Higher Education recommend to the General Assembly that Section 10-326 (f) of the General Statutes be amended to allow proprietary as well as independent institutions to propose to the Commission for Higher Education cooperative programs, facilities, and services for funding under the provisions of this section.*

The purpose of P.A. 73-140, An Act Concerning Contracts with Independent Colleges for Programs, Facilities, and Services by the Commission for Higher Education (see Appendix E) as stated in the Act is "to secure for the citizens of Connecticut the additional advantages which would accrue under more widely cooperative arrangements between the public and the private colleges...[that through contracts made by the Commission for Higher Education with independent colleges] such contracts shall encourage, promote, and encourage educational developments which are mutually beneficial to the citizens of the state and the independent colleges, increase the use of available facilities, prevent the duplication of expensive and specialized programs..." Each year independent colleges may submit to the Commission proposals for funding under the provisions of this act. For fiscal year 1973-74, $85,000.00 was appropriated for and distributed among nine programs. The current session of the General Assembly is

considering amending this act to allow public institutions to participate.

The programs and facilities of the state's proprietary schools are a valuable educational resource serving Connecticut's students and citizens. As has been noted, proprietary schools offer types of programs frequently unavailable in collegiate institutions. Many proprietary schools have facilities which could be utilized by the state with the result that the state could save money. These programs can in many cases complement and supplement degree programs in colleges. One member of the Resource Group, the director of a proprietary school, reported to the group that an increasing number of students in his institution held baccalaureate degrees, but needed the skills taught in his institution. It seems possible that if contractual arrangements were authorized, students would be able to cross register at a proprietary school while enrolled in a collegiate institution and obtain both the degree and the skill in four years. Informally, such arrangements now exist and should be formalized to insure that all students can benefit.

The Resource Group is aware that it will be necessary to establish standards to insure academic quality before contracts for programs are authorized. Those schools receiving degree granting status will have met such standards, and the Commis-

sion for Higher Education could establish a mechanism for the evaluation of programs in non-degree granting proprietary schools.

CONTRACTS FOR STUDENT SPACES

RECOMMENDATION 6: *That the Commission for Higher Education recommend to the General Assembly that Section 10-331 (a) of the General Statutes be amended to provide that degree-granting proprietary schools be included in the provisions of this section and that any allocations to proprietary schools be used solely for student financial assistance.*

Consideration of this legislation, An Act Relating to Contracts for Additional Student Spaces in Independent Colleges (see Appendix F), resulted in the conclusion that proprietary schools which may be licensed and authorized to award degrees by the Commission for Higher Education will be eligible to participate in the program.

One potential problem in applying the current legislation to any proprietary school, even those authorized to grant degrees, centers on the profit-making characteristic of these schools. Provisions of the legislation require that "Each participating college shall agree to expend an amount equal to at least eighty percent of the monies received under this act as direct financial assistance to Connecticut students." Thus, twenty percent of the funds may be used at the descretion

of the institution. Serious legal questions could be raised if the possibility for state monies being used as dividend payments to stockholders or as profits to owners should arise. In the recommendation concerning this act, a method for avoiding this problem is suggested. In addition to this specific problem, there are other complicating factors considered by the Resource Group with respect to P.A. 73-551.

The Subcommittee on Finance questioned the purpose of the program. The original version of this legislation was passed in 1969, a time when demand for higher education was high and the resources of the public sector could not meet the demand for student spaces. Clearly, in the present period of stable or falling enrollments, the demand factor is not the same; indeed, competition for students exists. The program now may be seen as a major vehicle for student financial assistance. A substantial amount of money -- $2,963,326 -- is expended on this program; compared to total state expenditures for student financial assistance this is a large proportion of the monies assisting students. That such monies should be earmarked for students attending only certain institutions seems a questionable practice and the Resource Group believes that a re-examination of the purposes and outcomes of P.A. 73-551 is warranted.

STUDENT FINANCIAL ASSISTANCE

RECOMMENDATION 7: *That an Office of Student Financial Assistance be established within the Commission for Higher Education.*

RECOMMENDATION 8: *That the Commission for Higher Education recommend that the General Assembly amend Section 10-361 of the General Statutes to provide maximum student loans of $2,500.00 per year and that the total amount to be loaned be increased accordingly.*

RECOMMENDATION 9: *That the General Assembly make appropriations to support a student financial assistance grant program for Connecticut students enrolled in proprietary schools in Connecticut.*

Today, more so than ever, students are encountering financial difficulties in obtaining postsecondary education. In a vicious circle, inflation affects both students and institutions and exacerbates what has always been difficult for many students -- finding money for postsecondary education. Postsecondary education is no longer the goal only of the wealthy or intellectually talented; it has become a necessity for all students who want to find a position in today's employment force. Whether the career goal is to be a secretary or a nuclear physicist, training beyond high school is necessary. Problems in financing are significant for students in any postsecondary institution, but students in proprietary schools face additional inequities.

Proprietary school students are not eligible to participate in the major state supported grant programs. The Commission for Higher Education has requested funds to support a program of "postsecondary education grants" for students attending proprietary schools. For fiscal year 1975-1976, the Commission requested $420,000 to fund approximately 750 grants averaging $700.00. This request is not included in the Governor's recommended budget. This Commission initiative is commendable, but it does not face the central question, are the students in proprietary schools second class citizens? The federal government in the Education Amendments of 1972 resoundingly answered no to that question. Since 1972 all federal student financial assistance programs, grants and loans, have been available to students attending proprietary schools accredited by national accrediting associations recognized by the U. S. Office of Education. The Resource Group believes that a parallel policy should be considered for state supported student financial assistance programs.

It is not difficult to make a strong case for the need for substantial increases in student financial assistance. In Connecticut state supported grant programs assist only approximately 3.5 percent of graduating high school seniors; and although not all high school seniors desire postsecondary education, the figure is still very low. When students can-

not obtain grants, they turn to loans. Analysis of information from Connecticut proprietary schools has shown how heavily students borrow to finance their education. Even this source of financial assistance is in tight supply. While in most states students can borrow up to $2,500 per academic year in Connecticut the amount is $1,500. There has been considerable national publicity about abuses of guaranteed loan programs by international correspondence schools and although the Resource Group does not believe that any institutions based in Connecticut are fraudulently operated, caution must be exercised to insure that the good record is maintained.

A good summary of the Resource Group's thinking about student financial assistance is found in the Master Plan for Higher Education:

> While a student financial assistance program may encourage a moderate amount of work or borrowing, it should be built primarily upon grants. No student should be forced to work to an extent that it interferes with academic success nor borrow so much that in his early adult life he is indebted to an extent that will handicap his potential for decent housing and marriage.
>
> Whatever program or combination of programs Connecticut adopts to meet the needs of its citizens for increased student financial assistance, it can best be administered and coordinated by a single commission. The Commission, in addition to administering the state programs, would coordinate state efforts with federal programs.[7]

INFORMATION SYSTEM

RECOMMENDATION 10: *That the Commission for Higher Education invite proprietary schools to participate in implementation of the Information System.*

If the proprietary sector is to be integrated into the Commission for Higher Education planning for postsecondary education, the availability of up-to-date, accurate and comparable information about the state's proprietary school is essential.

The capability for substantial improvement of information collection, analysis and utilization now exists as the Commission for Higher Education begins implementation of a coordinated information system for higher education. The development of the information system, according to its planners, will benefit decision makers by assisting them in determining answers to questions such as:

- How should resources be allocated to meet competing and complementary institutional objectives?
- How will changes in one area or institution affect other areas or institutions?
- How well are resources being used and objectives being met?
- How can we improve programs and ensure cost effectiveness? [8]

For participating institutions a major benefit will be the availability of programs for five systems - finance, stu-

dents, staff, programs, and facilities. All constituent units of the public system are cooperating in this effort and on a voluntary basis many independent colleges will participate. The Resource Group believes that the involvement of proprietary schools in the information system will benefit not only the schools but the planning and coordinating capabilities of the Commission for Higher Education.

GAINING CREDIT AND EXTERNAL DEGREES

RECOMMENDATION 11: *That the Board for State Academic Awards seek accreditation to award the Associate in Science degree.*

RECOMMENDATION 12: *That the Board for State Academic Awards extend external credit to students in proprietary schools through evaluations made by panels of judges qualified to determine the value of programs based on the accomplishments of students who matriculated through proprietary school programs.*

Members of the Resource Group discussed alternatives for assuring that students in proprietary schools are afforded an opportunity to seek acceptance of their work if they desire to transfer to collegiate institutions. As a small proportion of proprietary schools begin to award associate degrees the problem may be mitigated, but a majority of students will still face the problem of gaining academic recognition for their work

in proprietary schools. Current policies regarding transfer vary widely among institutions; it is not uncommon that different students from the same proprietary school will have different results when seeking transfer to the same collegiate institution. As has been noted, collegiate students too are afflicted with problems in transferring and for all students efforts should be made to improve transfer.

For the immediate needs of proprietary school students who want to obtain credit the State Board for Academic Awards (BSAA) is an existing vehicle. Currently, the Board is authorized to award only the Associate in Arts degree, but should seek to award the Associate in Science also. (The Subcommittee on Coordination of Planning has granted planning approval to a BSAA request to award this degree.) The latter degree would be appropriate for many proprietary school students. Each institution has the right to establish its own degree requirements and the primary purpose of establishing credit with BSAA is to enable students to meet requirements for the Associate in Science degree. Students of proprietary institutions who are enrolled with BSAA would be eligible for transfer of accumulated credits upon request to other degree-granting institutions. This would open the way to the baccalaureate degree and other academic and career goals.

The unique contribution proprietary schools can make in

providing education in specific areas of expertise must be appreciated. Schools should not be coerced into changing their courses to provide the degree requirements that can be provided by others. BSAA should recognize this capability and establish panels of judges capable of establishing an appropriate balance between occupational competency and academic theory, so that students can be measured on work achievement as well as general knowledge.

The purpose of this program should be two-fold. First, it should allow individuals to develop a degree program suited to personal goals through evaluation of their experience, accepted tests and recommended study. Secondly, it should provide a means whereby proprietary schools not desiring to award degrees can refer their graduates for the completion of degree requirements without loss of time, money or status, allowing such schools to maintain occupational standards without the necessity of modifying their courses of study.

Within its current mandate it is also possible that BSAA might make credit available on an individual basis from appropriate study obtained on the job, through "service connected" experience, work study, unaccredited programs or any combination thereof commensurate with BSAA standards. Once the value of education at an unaccredited school is established the BSAA might establish criteria to award individuals credit

obtained from such schools without additional examination and on the basis of established quality.

PUBLIC INFORMATION

RECOMMENDATION 13: *That the Commission for Higher Education, in conjunction with the State Department of Education, assume the function of disseminating information on the scope of postsecondary educational opportunities in Connecticut.*

In general, it appears that there is a broad lack of public awareness and understanding of the postsecondary educational picture in all sectors - public, private and proprietary - and at all levels, from the traditional four-year residential college or university program to those which are non-residential and predominantly career oriented. It is apparent that much needs to be done in the area of communications. Publications directed at specific groups who need information, better press coverage of education in newspapers and magazines, and improved presentations on radio and television will all assist in meeting the need for information. This communications program will become of increasing importance in the future, as the sources of clients for postsecondary educational programs expand and as the technology of our society allows more leisure time and, simultaneously, demands

more of our citizens in terms of knowledge and skills. Our programs of postsecondary education in Connecticut must be responsive to these changes, and our efforts to make information about these programs available to a broader public must be adequately planned and funded.

PLANNING FOR THE FUTURE

RECOMMENDATION 14: *That the Commission for Higher Education continue to support Master Plan recommendation 66: "...the Governor appoint a commission that will include representatives of the State Labor Department, the State Department of Commerce, the State Department of Education, the higher education community and other cognate groups, to determine what kinds of education are required to prepare students for life in the year 2000 and after".*

The opening pages of this report noted concern that the goals of American education are unclear and lack coherency. The Resource Group understands that a highly centralized and structured system would probably lack vitality and would not meet the multiple needs of democratic American life. It does appear, however, that thoughtful planning about the future, as called for in this recommendation, is needed at this time.

NOTES:

1. Trent, James W. and Leland L. Medsker. Beyond High School. (San Francisco: Jossey Bass, 1968). p. 225

2. Glenny, Lyman A. "The Race for Students: Competitive Challenges in Postsecondary Education." (Address before the National Association of Trade and Technical Schools, June 12, 1972, Los Angeles, Ca.).

3. Mayhew, Lewis B. Higher Education for Occupations. (Research Mongraph No. 20. Southern Region Education Board: Atlanta, Ga., 1974) p. 63

4. Katz, H.H. A State of the Art Study on the Independent Private School Industry in the State of Illinois. (State of Illnois Advisory Council on Vocational Education: Springfield, Ill., 1973). p. 45.

5. Resource Group IV. Programs: Distribution, Revision, Termination. (Connecticut Commission for Higher Education: Hartford, Conn., 1973). p. 21.

6. Connecticut Commission for Higher Education. Master Plan for Higher Education in Connecticut 1974-1979: Quality and Equality (Connecticut Commission for Higher Education: Hartford, Conn., 1974). p. 60.

7. Connecticut Commission for Higher Education. Master Plan for Higher Education in Connecticut 1974-1979: Quality and Equality (Connecticut Commission for Higher Education: Hartford, Conn., 1974). pp. 123-24

8. Connecticut Commission for Higher Education. Study Report and Information System Plan: System for Higher Education in Connecticut Volume I. (Connecticut Commission for Higher Education: Hartford, Conn., 1973). pp. 1-2

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APPENDICES

APPENDIX A

Private Schools for Trade Instruction and Special Occupational Training

Branford

- Branford Hall School of Business

Bridgeport

- Butler Business School
- Connecticut Business Institute
- County Schools**
- National Training Institute, Inc.

Danbury

- Warren Institute of Danbury

Darien

- The Thomas Institute*

East Hartford

- American Tractor Trailer Training, Inc.
- Computer Processing Institute of Conn.

Fairfield

- Data Services Institute

Hamden

- O.S.I. Data Processing Schools
- Paier School of Art

Hartford

- Aetna Data Processing Education Program
- Bartending School of Mixology
- Connecticut School of Broadcasting
- Data Institute
- Hartford Modern School of Welding
- Hartford Institute of Accounting
- Hartford Secretarial School
- IBM Education Center
- Morse School of Business

Meriden

Laurel of Connecticut

Milford

Technical Careers Institute, Inc.

Monroe

Colonial School of Tool Design

New Britain

Connecticut Stenographic Institute
Moody School of Commerce
New England Technical Institution
of Connecticut.

New Haven

Barbizon School of Modeling
Bartending School of Mixology
Connecticut School of Electronics
Fugazy International Travel School
New Haven Academy of Business
Stone School of Business

New London

New London School of Business

Norwalk

Katherine Gibbs School
Lee Johnson School of Business
Redding Ridge
Institute of Children's Literature*

Rocky Hill

Porter School of Drafting and Design

Somers

New England Tractor Trailer Training, Inc.

Southington

Briarwood School for Women

South Norwalk

Connecticut Academy of Dental Technology

Stamford

Barbizon School of Modeling
Merrill Business Schools, Inc.
NAEBM Westlawn School of Yacht Design*
Programming Institute of Connecticut
Stamford Data Processing School, Inc.

Stratford

Chester Institute for Technical Education
Connecticut School of Broadcasting

Westport

Famous Schools*

West Hartford

Introductory School of Banking

* Correspondence Courses Only
** Correspondence and Resident Courses

Appendix B

Connecticut State Department of Education
Hartford

Section 10-8. Licensing of private schools for trade instruction and special occupational training. No person, board, association, partnership, corporation or school shall, as a school, give instruction in any form or manner in any trade or part thereof or in the theory pertaining thereto, or any instruction which is claimed to qualify an individual for any position for which special occupational training is required, for any renumeration, consideration, reward or promise to pay unless such person, board, association, partnership, corporation or school has obtained a certificate from the state board of education authorizing the offering of such instruction. Requirements with respect to courses of instruction and the qualifications of instructors shall be determined by the state board of education, with the advice of the labor department. Such certificate shall be issued in accordance with regulations formulated by the state board of education, with the advice of the labor department, and promulgated by said board. For the issuance of such certificate a fee of not less than ten dollars and not more than one hundred dollars for any person, board, association partnership, corporation, school or branch thereof shall be charged by said board, and annually thereafter, on July first, a fee not exceeding ten dollars shall be charged for the renewal of such certificate, provided such certificate shall not be renewed unless, after inspection, the state board of education certifies that the instruction and equipment conform to the standards establish by said board. The provisions of this section shall not apply to schools unier public supervision and control, endowed schools not operated for profit or schools conducted by organizations for the training of their employees, nor to any person, school, board, association or corporation authorized by the general assembly to confer degrees. Any person, board, association, partnership, corporation or school which violates any provision of this section shall be fined not more than five hundred dollars. (February, 1965, P.A. 475, S.I.) Effective July 1, 1966.

FEL:1-1973

Connecticut State Department of Education
Division of Instructional Services
Hartford

REGULATIONS OF THE STATE BOARD OF EDUCATION CONCERNING THE LICENSING OF SCHOOLS OFFERING TRAINING FOR CERTAIN OCCUPATIONS ADOPTED JUNE 8, 1966, AS AMENDED DECEMBER 7, 1966

AUTHORITY: SECTION 10-8 of the 1965 SUPPLEMENT TO THE GENERAL STATUTES (P.A. 475, 1965 SESSION)

Section 1. As used in sections 1 to 10, inclusive of these regulations:

(a) "School" means an assembly of five or more pupils, students, learners, or apprentices with an instructor, teacher or teachers, organized for the purpose of giving and receiving instruction or training, or both, in any phase or curriculum of special occupational training. The term school shall include institutions, organized programs and enterprizes serving the purposes of supplying special occupational training, or imparting knowledge by personal, mechanical or electronic means. It shall include the place or places, used for instructional purposes, to which students come in groups; the central arrangement for sending one or more teachers to specific places for scheduled instruction to a group of students, for the supervision of such instruction, and the collection of fees or payments to instructors; and the offering of instruction by mail, provided the correction, grading and servicing of the home instruction shall occur within the state.

(b) "Special occupational training" means instruction or training in any form or manner, as a school, in any trade or part thereof, or in the theory pertaining thereto, which instruction is claimed to qualify an individual for a position which requires special training, or for gaining employment as a result of such instruction or training. It shall not include instruction, study of theory, or training applicable only to avocations, recreation, personal development or use, and pursued for purposes other than gainful employment.

(c) "Business school" means a program organized as a school which is maintained, or at which classes are conducted, for the purpose of offering resident instruction for a consideration, profit ot tuition, the purpose of which is to prepare an individual to pursue an occupation in business or the business phases of other occupations, for which graduation from a degree-granting institution is not required.

Section 2. (a) Sections 1 to 10 inclusive, of these regulations apply, but are not limited, to any school which offers special occupational training, instruction or theory in any apprenticeable trade, or any part thereof, as determined by the state board of education and the state department of labor, including (1) automotive trades, (2) boat building trades, (3) building and construction trades, (4) culinary arts trades, (5) design and drafting,

(6) foundry trades, (7) furniture trades, (8) jewelry and silversmith trades, (9) automatic screw machine trades, (10) machine tool and metal trades, (11) maintenance trades, (12) paper trades, (13) printing trades, (14) service trades, (15) technician trades, (16) textile trades and (17) other like occupations and trades, including those of airplane mechanic, electric motor repairman, furrier, hand polisher, industrial electrician, meter repairman, sign painter, glass bender, sprinkler fitter, tinsmith, welder, wire worker, plastic fabricator, fire door fabricator and drink mixer.

(b) Said regulation shall apply to schools of business and commercial practices, including theory, correlated studies, training and skills appropriate thereto, whether by class groupings examinations or correspondence.

(c) Said regulations shall apply to schools which are located in the state and offer courses, examinations, training or instruction in occupational fields by correspondence, by use of mailing facilities located in the state, by use of messengers and itinerant tutors and teachers, and other means of providing instruction, training or educational services leading to employment in trades requiring special occupational training or apprenticeship, whether or not the enrollees of the school are assembled in one place.

(d) Said regulations shall apply to schools whose purpose is, or includes, preparation of students or clients for taking examinations in the understanding, theory, skills or techniques appropriate to meeting the requirements for admission to, or employment in, or practice of, a trade or occupation requiring special occupational training, unless exempted by law.

(e) Said regulations shall not apply to schools development of individual talent exclusively, nor to education and training exempted by statute.

Section 3. (a) Each school shall be supervised by a full-time responsible administrative employee or officer of the school. If the school is a branch of a school whose principal location is outside of Connecticut, there shall be a resident agent or director whose designation, responsibilities and extent of authority shall be clearly stated in the application for certificate. Lack of proper authority on the part of the resident administrato or agent shall be considered sufficient reason for denying application or revoking a certificate of approval.

(b) The director of a school for mechanical or special occupational training shall have completed a senior high school course and had five years of experience in the area in which training is offered, or have completed a standard four-year college course and had three years of experience in the area of training. The director

of a business school shall have a degree from a four-year college and three years of experience in the area of training. If the school offers instruction in an area in which the director is not qualified, the department head or supervising teacher shall have the above qualification.

(c) Any teacher or other employee who gives instruction shall be a citizen of the United States, at least twenty-one years of age and of good character and repute, shall hold evidence of at least a high school education and such other evidence of educational competency as shall persuade an evaluating committee of his ability to instruct in the area, and shall have not less than two years of actual experience, or recognized teacher training, in the use of the skill or subject taught, except that for trade instruction the minimum practical experience shall be five years. An alien teacher may be employed at the discretion of the director and with the approval of the state board of education.

(d) Field representatives of the school shall be persons of integrity thoroughly familiar with the school and its offerings. They shall be furnished with statements of identification showing the limits of their authority and the standards of ethics required by the school which statement shall be available for inspection by prospective students, their parents or guardians, law enforcement agents and state officials. Irregularities in the activities of sales representatives or the failure of the school to conduct itself in the public interest by control of sales promotion by its representatives shall be grounds for denying application for renewal, or revocation of, the certificate of approval.

(e) Upon application for a certificate, and at the time of renewal of the certificate, the school shall furnish a roster of staff members and other employees included herein and shall declare under oath that the list is complete and accurate, that each member so listed meets the minimum requirements for the position in which he is employed. The school shall hold a statement dated within three years of the application and signed by a practicing physician attesting to the good health of the employee and his freedom from any health defect or condition which would adversely affect his relationships with students.

(f) The average student load for teachers shall not exceed fifteen pupils at any one time in shop or manipulative work or thirty pupils at any one time in theory or business practices subjects. This does not apply to laboratory or lecture courses in business subjects.

Section 4. (a) The course content shall conform to State Department of Education standards as determined by the state board of education. The length of the course shall be sufficient to give effective training in the subjects listed in the course content, and not less than the education and training essential for initial employment in an

industry or a business practice requiring special occupational training in the field for which the program is offered.

(b) Course content shall include instruction in hygiene and safety practices as applicable to the occupation in question.

(c) The school shall furnish each student at the time of enrollment with a printed document, bulletin, brochure or catalog, giving outlines and descriptions of the curriculums offered. The documents shall state in clock hours, or in weeks or months, the length of each course offered, and the time allotted for each course. The procedures to be used in integrating practical experience with theoretical knowledge, and the names, authors and editions of the principal texts and manuals to be used shall be furnished to the state board of education, if requested.

(d) A uniform system of grading within the school shall be maintained, and students shall be informed of their grades or standing, in writing, at least once each three months. In the case of minors, reports shall be made to parents or guardians.

(e) Certificates of graduation or certificates covering completion of a specific course, or courses, shall be issued. Sample copies of all types of certificates shall be approved by and shall be on file with the state board of education.

Section 5. (a) Buildings used for school purposes shall comply with all pertinent state and local laws, ordinances and requirements with respect to fire protection, hygiene, floor and air space, ventilation, heat and light.

(b) The equipment and facilities available for instructional purposes shall be sufficient in quantity, of excellent quality and recent design, and varied to provide the training specified in the course content for the maximum student enrollment in each of the several courses offered in the school.

(c) A library suitable to the needs of the students and faculty shall be provided and maintained by each school appropriate to the courses offered.

Section 6. (a) Requirements for admission shall be stated in a printed form supplied to each student and shall be such that each student may expect to be able to complete the course for which he is enrolled.

(b) The school shall maintain permanent student records showing entrance credits relating to previous education and training experience, the dates of admission and withdrawal, together with reasons for withdrawal, daily attendance and achievement.

(c) Financial aid and scholarships to students may be offered only upon the following bases:

(1) loans may be granted to worthy students;
(2) work or service scholarships may be granted for actual performance of duties and remuneration which is not in excess of the current local rates for comparable service;
(3) funded scholarships may be granted on the basis of the value, number and source of scholarships as printed in the school catalog; or upon application in writing by a scholarship candidate and the award by an officer of the school on the basis of a truly competitive or merit procedure.

(d) No offer of a premium or special financial inducement for registration to students or prospective students shall be made. No officer or employee of any school shall knowingly solicit any student to leave an educational institution at which he is in attendance, nor shall the school or its employees seek to induce any student to change his plans when such students has definitely enrolled in another school and has paid a deposit.

(e) The school shall publish in its catalog, or otherwise make available in printed form, its schedule of tuition rates and methods of payments and shall not deviate from such published rates. The school shall furnish the student with information regarding the cost of the necessary books, supplies, tools, clothing and equipment to be supplied by the student. The school shall state clearly and completely the cost and extra fees which are in addition to tuition, and shall regard as personal property of the student all books and other materials for which the student has paid.

(f) Enrollment contracts made between the school and prospective student shall fix the terms of payments for a miximum of one year, with reasonable provision for renewal or extension. The contract shall provide for discontinuance before completing the course and provide for the prompt payment of reasonable refunds at the time of the discontinuance or withdrawal. At the time of enrollment, the student shall receive a complete copy of the enrollment contract and other documents pertaining to the enrollment.

(g) A certificate or written statement of his achievement, if any, shall be issued to a student at his request at the time of withdrawal.

Section 7. (a) Advertising for the school shall be under the name of the school. Advertising shall be construed to mean informing the public or individual through the media of radio, television, telephone calls, hand bills, placards, newspapers, entries or displays in the classified pages of telephone directories, or other printed media.

(b) The school shall refrain from exaggeration, misleading statements or misrepresentation of any kind in its advertising, through its field representative or through any other agency. No school shall use "blind" advertisements to solicit prospective students, nor shall it advertise in the "help wanted" or other employment columns in newspapers or other publications. Illustrations in all advertising matter shall relate solely to the particular school, or be clearly designated otherwise.

(c) If a school uses in its advertising endorsements by manufacturers, business firms, organizations or individuals engaged in the line of work for which it trains, the school shall hold and be able to present written evidence of such endorsement, and shall publish the date of the endorsement in the advertising matter.

(d) Only regularly employed members of the faculty and the officers of the school shall be named in the advertising. If lecturers or demonstrators are mentioned in the advertising, such persons shall be designated as lecturers or demonstrators. If a course prepared by a well-known individual is offered by someone other than the person himself, it shall be clearly indicated that the course is given by a regularly employed member of the staff.

(e) No school shall advertise that it operates under state supervision. The words "holder of a certificate of authorization issued by the state board of education" may be used.

(f) Positions and careers shall be advertised only if the school is qualified and prepared to offer instruction which will enable the student to meet the requirements for such positions or careers.

(g) Employment opportunities shall be represented by the school orally or in writing exactly as they exist; there shall be no direct or implied guarantee of a position, although a school may mention the number of positions and the specific positions in which graduates of the

school have been placed by the school. Probable earnings in the field, or fields, for which the school trains shall be represented exactly as they are, and it shall be a violation of this regulation to feature only the highest salaries and wages earned by a few workers in a particular field. Placement activities of a school shall be free of charge to students or graduates.

Section 8. (a) Adequate financial records showing the school's cash receipts, disbursements, assets, liabilities and capital shall be maintained, and the adequacy and correctness of such records shall be certified annually to the secretary of the state board of education by a certified public accountant.

(b) Public liability insurance, property damage insurance and workmen's compensation insurance in the amounts of at least standard underwriting limits shall be carried by the school in a company authorized to do business in the state. The liability insurance shall specifically protect the students, and evidence of insurance shall be submitted annually to the secretary of the state board of education.

(c) The existence of an unsatisfied judgment against the school or its owners shall be considered grounds for denying an application for approval or for revoking a certificate.

Section 9. (a) The school shall be conducted on a level of educational, professional and business ethics satisfactory to the secretary of the state board of education and the labor commissioner. Upon complaint and evidence of unethical practice, violation of regulations, abuse of discretionary power, fraud or subversive conduct, inquiry may be instituted by the secretary of the state board of education or the labor commissioner, or both, and a report made to the state board of education which board, after full hearing, shall have the power to revoke the certificate, or to refuse renewal thereof.

(b) Minor fees for services or charges for products of students or instructors may be collected from the public when in the judgment of the secretary of the state board of education or the labor commissioner, such service or production shall be necessary to facilitate adequate practice in the area in which training is being offered.

(c) Any catalog, brochure, bulletin, circular or advertising statement made in other than media of general circulation shall be submitted with the application for a certificate or renewal.

Section 10. (a) Application for a certificate of approval shall be made on form provided by the state board of education and shall be accompanied by such additional information as the board may reasonably require and by payment of a fee of fifty dollars, which fee shall be returned if the application is not approved.

(b) At any time agreeable to the state board of education, and after consultation with the state labor department when joint action is appropriate, such board shall designate a member of the department as its agent whose duties shall be to review applications for certificates, or certificate

renewals, and to visit schools for the purpose of making reports and recommendations to the state board of education on matters of compliance with these regulations. The agent may, at his discretion or upon instructions from the secretary of the state board of education, assemble and direct a committee of persons of generally recognized competence in the areas of instruction to be visited, whose duty it shall be to evaluate, encourage and promote the improvement of the school in respect to its programs, facilities, business and professional conduct, ethical practices and such other phases of its activities as may seem desirable to the improvement of education in the state.

(c) Upon approval of the application, a certificate dated prior to the opening of the school year shall be issued to the applicant named in such application for the school at the location specified. Such certificate shall be displayed conspicuously in the school.

(d) The application for approval or for renewal shall give the name and address of the owner or owners and the manager of the private school covered by these regulations. If the owner is a corporation, the name of the corporation, a list of the executive officers of such corporation and their addresses, the name or names of the majority stockholders and their addresses and the name and address of the local manager, the director and the president shall be filed with the state board of education.

(e) The certificate of approval shallbe renewed annually upon application of the owners showing any changes in curriculum, faculty, financial arrangements, management, school operations, location or any other matter covered by these regulations, and upon payment of a renewal fee of ten dollars which fee shall not be returned if the application for renewal is denied.

(f) The certificate of approval of a school may not be sold, transferred or pledged.

(g) In the event of the death of any person to whom a certificate has been issued as an individual, the certificate shall become void.

(h) Any school to which a license has been issued by the state board of education prior to July 1, 1966, which license was in effect during the school year next preceeding that date, shall be deemed to have met the requirements of these regulations to the extent that they are pertinent, and certificate of approval shall be issued upon payment of the renewal fee of ten dollars. Renewal annually thereafter shall be upon the basis of the regulations and reporting as required herein.

Sections 10-8-1 to 10-8-7 inclusive of the regulations of Connecticut state agencies are repealed.

Purpose: The purpose of these regulations is to improve the bases for regulating certain private schools and for extending the coverage beyond schools for mechanical training to include schools of business education and apprenticeable trades as prescribed in Section 10-8 of the General Statutes, as amended by Public Act 479 of the 1965 Session of the General Assembly.

Appendix C

BYLAWS
OF THE CONNECTICUT ASSOCIATION OF PRIVATE SCHOOLS

ARTICLE I - NAME

The name of this association shall be the CONNECTICUT ASSOCIATION OF PRIVATE SCHOOLS.

ARTICLE II - PURPOSES

The purposes of this Association shall include the establishment and advancement of sound educational and ethical standards in the field of education in and among proprietary schools in Connecticut; to engage in research for the advancement of education in proprietary schools, to cooperate with other agencies and organizations interested in the field of education on behalf of member institutions, the common standard of which is the independent governance of the institution through primary reliance upon tuition receipts for operations in the post-secondary vocational area; to cooperate with Federal, State, and local educational institutions and authorities in the maintenance of high standards and the sound policies in the educational field; the promotion, and support of an organization whose membership is dedicated to the principles and purposes herein set forth.

ARTICLE III - MEMBERSHIP

Section 1 - Institutional Members

(a) Member. Any proprietary school within the State of Connecticut which offers resident programs including study of a business, office or vocational nature.

(b) Responsibility. Each Member, is subject to and bound by all the laws and rules of this Association as in force at the time of admission of such Member or as altered, revised, or amended thereafter.

Section 2 - Election of Members

(a) Membership. Every school shall be a Member of the Association subject to the provisions of these Bylaws assuming all rights, privileges, and obligations as provided herein.

(b) Application and Notice. A written application for membership must be submitted by the responsible offical in such form as the Board of Directors may prescribe. Published notice of each application will be sent to all Members. The notice will state that any objection to the applicant must be sent to all Members. The notice will state that any objection to the applicant must be sent to the Executive Director within thirty (30) days. Thereafter, a majority vote of the Board of Directors which may be taken by mail, will be necessary for the election of a Member.

Section 3 - Use of Seal

The offical seal of the Association may be used as long as a Member is in good standing and fulfills all requirements of membership. If membership is terminated for any reason, use of the seal shall be discontinued forthwith. All use of the seal shall be eliminated from stationery, advertising, literature, or other materials within thirty (30) days.

Section 4 - Resignation

Any Member may withdraw from the Association after fulfilling all of its obligations to the Association by giving written notice to the Board of Directors. All property of the Association in the possession of the resigning Member shall be returned to the Association on or before the effective date of the withdrawal.

Section 5 - Termination of Membership

(a) The termination of Membership shall be for good cause by majority vote of the Board of Directors.

Section 6 - Voting

(a) Each Member of the Association shall have one vote. In the event that a member school is part of the ownership of a multiple system of schools or itself owns one or more branch schools, each such individual school has the right to vote only if such school maintains separate membership in the Association.

The vote of a member school may be cast only by a bona fide executive of the member school or of its ownership entity. No person shall vote for more than one member school. Proxies

shall not be permitted on any vote, mail otherwise.

Any member school which is delinquent in his fees will not be furnished a ballot. Any vote of a member school which is thus delinquent is void and will not be counted. The same will apply to a school whose membership has been terminated.

Section 7 - Holding Office; Rights and Limitations

(a) A person must be a bona fide executive of a member school to hold office in the Association as: President-Elect, President, Immediate Past President, or Treasurer.

Section 8 - Membership Liability

No Member of this Association shall be liable for the debts of the Association in any amount in excess of the membership fee required of such Member for the year in which the indebtedness is legally established, together with such voluntary subscription as such Member may have made to the Association.

ARTICLE IV - DUES, FEES AND ASSESSMENTS

Section 1 - Annual Amount

The Board of Directors shall have the authority to establish the amount of the annual Member dues.

Section 2 - Payment

Fees are payable September first in advance. Membership in the Crganization is automatically delinquent beginning October 15 if fees are not paid by that date. Membership is automatically terminated for any delinquency December 15.

Section 4 - Assessments

No assessments other than regular dues and fees may be made except by a majority vote of all Members of the Association in attendance at a regular or special meeting called in accordance with the provisions of Article V.

Section 5 - Prorating Dues and Fees

If a member is elected to membership during the first three (3) months of a fiscal year, it shall pay the full amount of annual dues and fees. If it is elected to membership during any succeeding quarter, it shall pay a proportionate amount determined by the number of quarters remaining after its election, including the quarter in which its election occurred.

Section 6 - Fical Year

The fiscal year of the Association shall be from September 1 through August 31.

ARTICLE V - MEETINGS

Section 1 - Annual Meetings

There shall be annual meeting of the Association at a date and place which shall be determined by the Board of Directors. The purpose of such annual meeting shall be for the election of officers for receiving the annual reports, and the transaction of other business. Notice of the time and place of such meetings, signed by the president, shall be mailed to the last recorded

address of each Member at least thirty (30) days before the time appointed for the meeting.

Section 2 - Special Meetings

Special meetings of the Association shall be held at the call of the President or shall be called by him upon the written request of a majority of the members of the Board of Directors. The President shall send notice of the time and place of such meeting to each Member of the Association not less than fifteen (15) days prior thereto, unless such notice is waived by consent of the Members of the Association in assembly with a quorum present.

Section 3 - Quorum

At least 12 members shall constitute a quorum for the transaction of business at any meeting of the Association. In case there be fewer than this number, the presiding officer shall adjourn the meeting from time to time until a quorum is present.

ARTICLE VI - ORDER OF BUSINESS

Section 1 - Order Of Business

The order of business at all meetings of the Association and the Board of Directors shall be in accordance with "Robert's Rules of Order Revised" (by Henry Martin Robert).

ARTICLE VII - BOARD OF DIRECTORS

Section 1 - Administration and Composition

The management, affairs, business and general administration of the Association are vested in a Board of Directors. The Board is composed of the President of the Association, the President-Elect, the Treasurer, the immediate Past-President, and the chairman of each of the regularly constituted committees.

Section 2 - Duties of Directors

The Board of Directors shall have the power to hold meetings at such time and place as they may deem proper, to admit Members by ballot as heretofore provided, to appoint committees. on particular subjects from the memb ers of the Board or from other Members of the Association, to audit bills and to authorize disbursements of the funds of the Association, to print and circulate documents and publish articles, to employ agents, and to devise and carry into execution such other measures as they may deem proper and expedient to promote the objects of the Association and to best protect the interests and welfare of the Association.

Section 3 - Meetings of Directors

Meetings of the Board of Directors may be called by the President; and notices of such meetings shall be mailed to the last recorded address of each Director at least fifteen (15) days before the time appointed for such meetings. The President shall, at the request in writing of a majority of the Board of Directors, issue a call for a special meeting of the Board of Directors; and fifteen (15) days' notice shall be

required for such special meeting. There shall be a regular meeting of the Board in connection with the Annual meeting of Members.

Section 4 - Attendance of Members

Members in good standing shall be privileged to attend all meetings of the Board of Directors, with the right to express their opinions but not the right to vote.

Section 5 - Quorum

A majority of the Board of Directors shall constitute a quorum for the transaction of business. If a quorum be not present, a lesser number may adjourn the meeting to a later day, not more than ten days later, without further notice.

Section 6 - Indemnity

The Associat ion shall indemnify and hold harmless each Director and each Officer of the Association against and from all loss, cost, and reasonable expences hereafter incurred by him in the payment, settlement, and defense of any claim, suit, or proceeding brought against him because he is or has been such Director or Officer, or because of any action alleged to have been taken or omitted by him as such Director or Officer. The rights of indemnification and exoneration occurring under this Article shall apply whether or not such person continues to be a Director of Officer at the time any loss, cost, or expense is suffered or incurred. Such rights shall not apply in relation to any matters as to which (1) such Director or Officer shall be adjudged in final judgment in such suit or proceeding to be liable for willful misconduct

of for his own negligence.

ARTICLE VIII - OFFICERS

Section 1 - Officers

(a) The Officers of this Association shall be the President, the President-Elect, the immediate Past President, The Treasurer, and Secretary, each must be a Member in good standing and will be entitled to vote as a member of the Board of Directors.

(b) The President-Elect and the Treasurer shall be elected at the annual meeting of the Association. Each may be elected for a term of one year or until his successor has been elected and qualified.

(c) The President-Elect may hold office as a President-Elect only for a term of one year or until his successor is elected and qualified. The President-Elect shall automatically become the new President at the end of the President's term of Office. The President shall serve the term of one year or until his successor is elected and qualified.

Section 2 - Duties of Officers

The duties and powers of the Officers of the Association shall be as follows:

PRESIDENT - The President shall preside at all meetings of the Association and of the Board of Directors; he shall have general supervision of the affairs of the Association, shall make reports to the Board of Directors and to the membership, and shall perform such other duties as are incident to his office or assigned to him by the Board of Directors.

PRESIDENT-ELECT - In the case of death or absence of the President, or his inability from any cause to act, the President-Elect may also serve as chairman of one of one or more of the committees of the Association. If the President-Elect shall be unable to perform the duties of his office because of death or his inability from any cause to act, the Board shall immediately hold a new election to fill the office of President-Elect.

IMMEDIATE PAST PRESIDENT - The most recent Past President willing to serve shall hold this office. In the case of death or absence or inability from any cause to act of both the President and the President-Elect, he shall perform the duties of the offices of President pending election to fill the two offices. The immediate Past President, in addition to such duties as are assigned to him by the Board or the President, will serve as Chairman of the Nominating Committee and as the Chairman of the Awards and Recognition Committee.

SECRETARY - The Secretary shall issue notice of all meetings. He shall also keep full and complete minutes of all meetings of the Board and membership, amd make such reports and perform such other duties as are incident to his office or as may be required of him by the Board of Directors and the President.

TREASURER - The Treasurer shall present to the membership at the annual meeting a report of the financial operations for the preceding year. He shall submit to the Board, after approval by the Executive Committee, a budget for the forthcoming year. He also shall make such reports and perform such other duties as are incident to his office or as may be required of him by the Board and the President.

Section 3 - Term of Office

The term of office for all elected Officers shall be one year and shall commence after election at the annual meeting. The President-Elect may serve only one term but the Treasurer and Secretary may serve not more than three terms consecutively. The President, Treasurer and Secretary shall not be executives of the same school or ownership entity, even if separate membership is held as required in Article III, Section 6.

ARTICLE IX - EXECUTIVE AND NOMINATING COMMITTEES

Section 1 - Executive Committee

The Executive Committee of the Board of Directors will consist of the President, immediate Past President, and such additional Directors as the Board shall deem necessary. The Executive Committee will act for the Board of Directors but within the limits of such written policies and resolutions as may be established by the Board of Directors.

Section 2 - Nominating Committee

The President, with the consent and approval of the Board of Directors, will each year appoint a Nominating Committee composed of members, none of whom, except for the Immediate Past President who will be Chairman, are serving on the

Board or the Commission.

The faculty shall notify all Members of the Association of this Nominating Committee, at least sixty (60) days before the annual meeting, requesting that any suggestions for nominations be sent to the Nominating Committee. Not less than thirty (30) days before the annual meeting, the Chairman of this Committee shall communicate with the other members of his Committee to select one candidate each for the offices of President-Elect and Treasurer and at least on candidate for each of the offices of Commissioner subject to election. These nominations will then be certified through the Secretary of the Association who shall transmit a list of the nominees to the Members together with a notice of the annual meeting at least fifteen (15) days in advance of said annual meeting.

The report of this Nominating Committee shall be read at the annual meeting. Additional nominations may be made from the floor. If such nomination is seconded and not declined, the person so nominated shall be added to the candidates for election.

ARTICLE X - COMMITTEES

Section 1 - Appointment of Committees

The President, with the consent and approval of the Board of Directors, shall appoint all standing committees, special committees, and their chairmen. All committees shall make reports in writing to the Board of Directors as the Board may require. The President, in appointing all standing committees, may appoint members of the Board of Directors as chairmen of

the committees or as Board representatives to the committees.

Section 2 - Educational Standards Committee

The duties of this Committee shall be to study, report, and recommend desirable educational criteria and standards, and to study, report, and recommend with respect to such other educational problems of the independent institution.

Section 3 - Ethics Committee

The duties of this Committee shall be to study, report, and recommend desirable ethical criteria and standards, and to study, report, and recommend with respect to such other operating, administrational, and institutional problems of the independent institution. At the request of the Board, it shall receive complaints regarding deviations from the criteria and standards, undertake investigation thereof make findings of facts pursuant thereto, render advisory opinions thereon subject to the review of the Board, and advise with the membership concerning criteria and standards.

Section 4 - Finance and Budget Committee

This Committee shall assist the Treasurer in preparing a budget for presentation to the Board of Directors at the meeting in connection with the annual membership meeting. The Committee shall also have the duty of developing plans for raising funds for present and future years needed to conduct the affairs of the Association, including recommendations from time to time for changes in the dues structure.

Section 5 - Awards and Recognition Committee

The duties of this Committee will be to determine the

individual or individuals who shall receive the awards or other recognition of distinguished service to the Association. The Board of Directors shall determine which awards or other recognition of distinguished service shall be given, but the selection of the recipient shall be the sole responsibility of the Committee.

ARTICLE XI - COMPENSATION AND EXPENSES

Section 1 - Compensation and Expenses

None of the elected Officers of the Association shall receive any compensation for their services as such to the Association. Elected Officers of the Board, committee chairmen and members, and other duly authorized representatives of the Corporation may be reimbursed for reasonable and necessary expenses incurred in connection with the performance of duties on behalf of the Association.

ARTICLE XII - AMENDMENT AND REFERENDUM

Section 1 - Amendment and Referendum

Policy matters of major importance, including amendment, repeal, or alteration of the Bylaws, in whole or in part, may be permitted from time to time by either of the following methods listed below.

Section 2 - Mail Ballot

The matter may be decided by a mail referendum vote to the Members for decision. Such a referendum may be initiated by the Board or upon written petition of ten (10) Members, unrelated by common ownership or management. Two-thirds vote of the Members voting in the mail referendum will be necessary for

adoption.

Section 3 - Regular or Special Meeting

The matter may be decided at any duly called meeting, regular or special. Two-thirds vote of the Members present and voting will be necessary for passage or adoption.

Section 4 - Procedures and Notice

In either case, it is mandatory that the proposed change or policy matter be filed with the faculty at least forty-five (45) days in advance of the meeting date or ballot counting date; and a notice of the proposal, with a copy thereof, will have been mailed to all Members not less than thirty (~~35~~) days in advance of such meeting which is to consider the change or the date set for the ballot count.

ARTICLE XIII - MISCELLANEOUS PROVISIONS

Section 1 - Dissolution

The Association shall use its funds only to accomplish the objects and purpose specified in these Bylaws, and no part of said funds shall inure, or be distributed to the Members of the Association. On dissolution of the Organization, any funds remaining shall be distributed to one or more regularly organized and qualified charitable, educational, scientific, or philanthropic organizations to be selected by the Board of Directors.

ARTICLE XIV - RULES OF ORDER

Section 1 - Parliamentary Procedure

Robert's Rules of Order Revised (by Henry Martin Robert)

shall govern the proceedings of all bodies of the Association except where otherwise specified in these Bylaws.

Section 2 - Adoption

These Bylaws were duly adopted by vote of the Members of the Association in November, 1973, and are effective December 1, 1973.

THE CONNECTICUT CONFERENCE OF INDEPENDENT COLLEGES

The CCIC is an incorporated voluntary association of nineteen independent non-profit institutions of higher education in Connecticut. It includes all private colleges except a few religious seminaries.

The colleges support the CCIC by a system of dues. 20% of the budget is divided equally, and the rest according to enrollment using a complicated formula.

There are two full-time senior members and two part-time.

The principal duty of the CCIC is to work with the State Commission for Higher Education, with the Legislature, and with the Governor's office on matters affecting the independent colleges. Part of this is lobbying in support of legislation favoring the colleges, or opposing or seeking clarification or amendment of legislation which might hurt the colleges.

The CCIC also carries out studies of the condition of the colleges: enrollment, finance, facilities, programs, personnel policies, and the like. The results are useful to the colleges themselves and as a guide to public policy.

The CCIC also coordinates the position of the colleges on federal legislation, although this is not a major activity.

There are also committees to cooperate on specialized problems such as purchasing, public relations, and admissions.

The Commission for Higher Education has been engaged in the preparation of a Master Plan for Higher Education in Connecticut.

The CCIC has cooperated in this work on behalf of the independent colleges.

W. Lewis Hyde 3/12/75

CONNECTICUT CONFERENCE OF INDEPENDENT COLLEGES, INC.

CONSTITUTION

ARTICLE I - NAME

The name of the organization shall be the Connecticut Conference of Independent Colleges, Inc.

ARTICLE II - PURPOSES

The primary purposes of the Conference shall be to provide a forum for the discussion of opportunities and problems common to the independent colleges of the State, and to improve in any appropriate manner the general climate for private higher education in Connecticut. When such action is specifically approved by a majority of the members, the Conference may take an official position with respect to an issue of public policy. However, it shall be the right of any member college to dissent from majority opinion, and to declare its opinion a matter of record.

The Conference is a non-profit, non-sectarian organization.

ARTICLE III - MEMBERSHIP

Section 1. Active: Any non-public institution of higher education in Connecticut, if accredited by the Commission for Higher Education, is eligible for active membership, on recommendation of the Executive Committee.

Section 2. Provisional: For an institution which has not yet received accreditation, there is available a Provisional Membership, on recommendation of the Executive Committee, for a period not exceeding two years.

ARTICLE IV - DELEGATES

Each Active and Provisional member shall be entitled to be represented by two delegates. Each delegate from active members shall have one vote. The chief executive officer of any member institution may appoint an alternate delegate for any meeting which a regular delegate is unable to attend, and such alternate shall exercise the same powers as the regular delegate.

ARTICLE V - OFFICERS

The officers of the Conference shall be a President, Vice President, and Secretary-Treasurer, whose duties shall be those ordinarily pertaining to such offices. They shall serve for one year or until their successors are elected.

ARTICLE VI - MEETINGS

Meetings shall be held in accordance with the By-Laws.

ARTICLE VII - DUES

Dues shall be calculated as provided in the By-Laws.

ARTICLE VIII - QUORUM

Representatives from a majority of active institutional members shall constitute a quorum for carrying on business at any meeting of the Conference.

ARTICLE IX - AMENDMENTS

This constitution may be amended at any meeting of the Conference by a two thirds vote of the active institutional members, providing that the proposal has been distributed in writing at least four weeks before this meeting. Any delegate of any active member may propose an amendment which shall be presented in writing to the Secretary-Treasurer at least six weeks before a meeting of the Conference.

ARTICLE X - DISSOLUTION

Upon dissolution, any assets of the corporation shall be distributed to the member institutions of the corporation which are then charitable organizations (as defined in Section 501(c)(3) of the Internal Revenue Code of 1954, as now in force or afterwards amended) in proportion to the dues paid by each such member for the prior year.

May 10, 1972

CONNECTICUT CONFERENCE OF INDEPENDENT COLLEGES, INC.

BY-LAWS

ARTICLE I - MEETINGS

There shall be at least two meetings of the Conference each year to be held at times designated by the Executive Committee. One of these meetings shall be held during the fall, and will be the annual meeting, at which times officers will be elected for the ensuing year.

Special meetings may be called at any time on call of the President, or on request of three of the active institutional members.

ARTICLE II - DUES

Section 1. Membership dues shall be established each year by the Executive Committee, in accordance with a formula to be recommended by the Executive Committee, and approved by the Conference at its annual meeting.

Section 2. Whatever formula may be adopted, the minimum dues for any active member will be $100 annually.

Section 3. Billing for dues will be made twice each year, in accordance with the formula adopted. The first billing will be made on July 1, and the second on January 1 of the following year. The first billing will be based on the enrollment of institutions for the current year, as reflected by the report the preceding fall to the Commission for Higher Education; the second billing will be based on enrollment figures submitted to the Commission for Higher Education, and will correct any errors which have arisen through an erroneous overestimate or underestimate.

Section 4. The fiscal year of the Conference will begin on July 1 of each year and conclude on the following June 30.

ARTICLE III - EXECUTIVE COMMITTEE

Section 1. The Executive Committee shall be composed of the President, Vice President, Secretary-Treasurer, immediate past President, and two members at large. No Executive Committee members at large shall serve in this capacity for more than two consecutive years, although after a lapse of one year, such members are eligible for reelection. All will be elected at the annual meeting for a term of one year.

Section 2. The Executive Committee shall have the authority to appoint an Executive Director and such other employees as may be deemed necessary by them. It shall also determine the compensation, duties, and responsibilities of such employees.

Section 3. The Executive Committee shall meet at the call of any officer, or the Executive Director, and shall be fully in charge of the affairs of the Conference, subject to approval of the Conference itself.

This Committee shall act on applications for membership and report its recommendations to the Conference.

Section 4. Vacancies on the Executive Committee which may occur between annual meetings may be filled, pending the next annual meeting, by the Executive Committee itself.

Section 5. A quorum for the Executive Committee shall consist of a majority of its members.

ARTICLE IV - SPECIAL COMMITTEES

Section 1. Nominating Committee: In July of each year the President shall appoint a Nominating Committee to bring before the annual meeting a slate of officers for the coming year. The report of the Nominating Committee shall not preclude additional nominations from the floor.

Section 2. Other Committees: The President shall appoint other special committees as the need arises. These special committees shall continue in office until the next annual meeting of the Conference and will then terminate unless requested by the Conference to continue.

ARTICLE V - AMENDMENTS

Amendments or additions to these By-laws may be made at any meeting of the Conference by a majority vote of the acting institutional members, provided that the proposal has been distributed in writing at least four weeks before that meeting. Any delegate or any active member may propose an amendment which shall be presented in writing to the Secretary-Treasurer at least six weeks before a meeting of the Conference.

Appendix E

PUBLIC ACT 140

Contracts with Independent Colleges for Use of Programs, Facilities and Services

Be it enacted by the Senate and House of Representatives in General Assembly convened:

Section 10-326f of the general statutes (as amended by public act 73-311) is repealed and the following is substituted in lieu thereof:

(a) In order to secure for the citizens of Connecticut the additional advantages which would accrue under more widely cooperative arrangements between the public colleges and the independent colleges, the commission for higher education is authorized to enter into contracts with the independent colleges. Such contracts shall encourage, promote, and coordinate educational developments which are mutually beneficial to the citizens of the state and the independent colleges, increase the use of available facilities, prevent the duplication of expensive and specialized programs, and further motivate cooperative efforts by the public system of higher education and the independent colleges to direct their work to the solution of contemporary societal problems.

(b) For the purposes of this section (1) a program is defined as a course of study leading to certification, licensure, certificate, or degree at all post-secondary levels; (2) a facility is defined as a building or an area within a building, a group of buildings, a special area, or specialized items of equipment used for educational purposes; (3) a service is defined as a formal activity designed to explore scientific, technological or humanistic problems, to find solutions to contemporary societal problems or to provide selected public service or student service activities; (4) an independent college or university is a college or university located in this state which is not included in the Connecticut system of public higher education and whose primary function is other than the preparation of students for religious vocation; (5) A CONSORTIUM IS AN ASSOCIATION COMPOSED OF TWO OR MORE PUBLIC OR INDEPENDENT COLLEGES OR UNIVERSITIES.

(c) The commission for higher education is authorized to contract with independent colleges and universities for the use of programs, facilities, and services as defined in subsection (b) of this section. The commission for higher education shall provide continuing evaluation of the effectiveness of such contracts and shall submit on or before February first annual reports and recommendations to the governor and the joint standing committee on education. In administering this section, the commission for higher education shall develop and use fiscal procedures designed to insure accountability of public funds.

(d) THE COMMISSION FOR HIGHER EDUCATION SHALL ENCOURAGE THE FORMATION OF CONSORTIA IN ORDER TO PROMOTE THE PURPOSES OF THIS SECTION, AS STATED IN SUBSECTION (a) OF THIS SECTION, AND MAY REIMBURSE EACH PUBLIC OR INDEPENDENT INSTITUTION PARTICIPATING IN ANY SUCH CONSORTIUM FOR COSTS INCURRED BY SUCH INSTITUTION IN PROMOTING THE PURPOSES OF THIS SECTION THROUGH THE ACTIVITIES OF SUCH CONSORTIUM.

Appendix F

PUBLIC ACT NO. 73-551

AN ACT RELATING TO CONTRACTS FOR ADDITIONAL STUDENT SPACE IN INDEPENDENT COLLEGES.

Be it enacted by the Senate and House of Representatives in General Assembly convened:

Section 1. Section 10-331a of the 1969 supplement to the general statutes, as amended by section 16 of number 53 of the special acts of 1972, is repealed and the following is substituted in lieu thereof: In order to secure opportunities in post-secondary education for the greatest number of its qualified citizens and in order to insure an adequate number of student places in the total system of higher education and in order to realize the benefits which accrue both to students and to the state, the state, acting through the commission for higher education, (1) shall promote and coordinate the continuing development of the independent colleges with that of the public colleges and (2) shall, without infringing upon the autonomy of the independent institutions, reimburse those independent institutions which choose to provide and make available to UNDERGRADUATE Connecticut students the number of student places required by the commission. The commission shall determine the number of such FULL-TIME AND FULL-TIME EQUIVALENT OF PART-TIME student places it will require of any participating independent college upon the basis of the number of such student places needed in the state as a whole and the need in the region concerned, and the viable number such college can supply with due regard to its educational resources and capability (: and); (3) shall guarantee the amount of financial aid as specified in the contract between the independent institutions and the state of Connecticut (.); AND (4) SHALL DEVELOP THE CRITERIA FOR DETERMINING THE FULL-TIME EQUIVALENCY OF PART-TIME STUDENTS.

Sec. 2. Section 10-331b of the 1969 supplement to the general statutes, as amended by section 17 of number 53 of the special acts of 1972, is repealed and the following is substituted in lieu thereof: For the purposes of sections 16 to 22, inclusive, of number 53 of the special acts of 1972, as herein amended. ((1) a "Connecticut student," if single, is defined as a student whose last legal address prior to acceptance for admission by his present college, was in the state of Connecticut; (2) a "Connecticut student," if married and residing with his spouse, is defined as a student whose legal residence at the time of registration in college was in the state of Connecticut; (3) a "full-time undergraduate student" is defined as a student who has been registered at a college and who has been accepted for matriculation in a course of study leading to an associate or bachelor degree and who is carrying twelve or more semester credit hours by that college; (4) and "independent college" is a college located in this state which is not included in the Connecticut system of public higher education and whose primary function is not the preparation of students for religious vocation; (5) "commission" means the commission for higher education.) (1) AN "UNDERGRADUATE CONNECTICUT STUDENT" IS DEFINED AS A STUDENT WHOSE LAST LEGAL ADDRESS PRIOR TO ACCEPTANCE FOR ADMISSION BY HIS PRESENT COLLEGE WAS IN THE STATE OF CONNECTICUT, PROVIDED SUCH STUDENT IS SINGLE, OR A STUDENT WHOSE LEGAL RESIDENCE AT THE TIME OF REGISTRATION IN COLLEGE WAS IN THE STATE OF CONNECTICUT, PROVIDED SUCH STUDENT IS MARRIED AND RESIDING WITH HIS SPOUSE;

(2) A "FULL-TIME UNDERGRADUATE CONNECTICUT STUDENT" IS DEFINED AS A STUDENT WHO HAS BEEN REGISTERED AT A COLLEGE AND WHO HAS BEEN ACCEPTED FOR MATRICULATION IN A COURSE OF STUDY LEADING TO AN ASSOCIATE OR BACHELOR DEGREE AND WHO IS CARRYING TWELVE OR MORE SEMESTER CREDIT HOURS AT THAT COLLEGE; (3) A "PART-TIME UNDERGRADUATE CONNECTICUT STUDENT" IS AN INDIVIDUAL WHO HAS BEEN REGISTERED AT A COLLEGE IN A COURSE OR COURSES THE ACADEMIC CREDIT FOR WHICH CAN BE APPLIED TOWARD A DEGREE AT THAT COLLEGE, AND WHOSE LAST LEGAL ADDRESS AT THE TIME OF REGISTRATION IN COLLEGE WAS IN THE STATE OF CONNECTICUT; (4) AN "INDEPENDENT COLLEGE" IS A COLLEGE LOCATED IN THIS STATE WHICH IS NOT INCLUDED IN THE CONNECTICUT SYSTEM OF PUBLIC HIGHER EDUCATION AND WHOSE PRIMARY FUNCTION IS NOT THE PREPARATION OF STUDENTS FOR RELIGIOUS VOCATION; (5) "COMMISSION" MEANS THE COMMISSION FOR HIGHER EDUCATION.

Sec. 3. Section 18 of number 53 of the special acts of 1972 is repealed and the following is substituted in lieu thereof: The commission for higher education shall provide to the participating independent colleges (.) a grant per student not to exceed an amount equal to one-half of the difference between the average cost to the state for educating full-time undergraduate students in public two and four-year programs and the tuition charges made to students in those public institutions. (The number of participating Connecticut students under this act shall be determined by the commission, but shall not exceed ten per cent of the full-time undergraduate Connecticut students in independent colleges and the total available appropriation.) THE NUMBER OF ELIGIBLE UNDERGRADUATE CONNECTICUT STUDENTS UNDER THIS ACT SHALL BE DETERMINED BY THE COMMISSION BUT THE AWARDS BASED UPON SUCH COMPUTATION SHALL NOT EXCEED THE TOTAL AVAILABLE APPROPRIATION. Each participating college shall agree to expend an amount equal to at least eighty per cent of the monies received under this act as direct financial assistance to Connecticut students. Direct financial assistance does not include loans to Connecticut students which must be repaid to the college at some future date nor does it include work-study programs.

Sec. 4. This act shall take effect July 1, 1973.